

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

FREDRIC N. ESHELMAN,

Plaintiff,

VS.

TRUE THE VOTE, INC.,
CATHERINE
ENGELBRECHT, GREGG
PHILLIPS, OPSEC GROUP,
LLC, JAMES BOPP, JR.,
AND THE BOPP LAW
FIRM,

Defendants.

CIVIL ACTION NO.

4:20-cv-04034

JUDGE CHARLES ESKRIDGE

EXHIBIT LIST OF PLAINTIFF, FREDRIC N. ESHELMAN

No.	Description	Offer	Object	Date Admit	Date N/Adm
1.	Wells Fargo Account Detail for True the Vote (TTV 0002)				
2.	Articles of Formation o/b/o OPSEC Group, LLC				
3.	November 23, 2020 email from C. Engelbrecht to re Invoice cancellation and attached letter from Old Town Digital re the same (Dkt. No. 41-1)				
4.	Defendants James Bopp, Jr. and The Bopp Law Firm, PC's Response to Plaintiff's Expedited Discovery				

5.	November 5, 2020 email between F. Eshelman and T. Crawford re speaking with head of True the Vote (Eshelman 00010)				
6.	November 5, 2020 email between F. Eshelman T. Crawford re I need something in writing describing what we are doing (Eshelman 00012)				
7.	November 5, 2020 emails between Bank of America, Eshelman and Crawford re TTV Funding Channels (Eshelman 00014-15)				
8.	November 5, 2020 emails between T. Crawford and C. Engelbrecht re Validate the Vote 2020 overview of plan (Eshelman 00023)				
9.	November 5, 2020 email between F. Eshelman and. T. Crawford re VTV launch of press release (Eshelman 00027)				
10.	November 6, 2020 email between C. Engelbrecht and T. Crawford re Legal expenses estimate (Eshelman 00049)				
11.	November 8, 2020 email between F. Eshelman and C. Crawford re we need hard numbers asap (Eshelman 00059)				
12.	November 9, 2020 email between C. Engelbrecht and F. Eshelman re Spend (Eshelman 00066-67)				

13.	November 9, 2020 emails between C. Engelbrecht and F. Eshelman re spend (Eshelman 00071-72)				
14.	November 10, 2020 emails between C. Engelbrecht and F. Eshelman re Following up (Eshelman 00086-87)				
15.	November 10, 2020 email between F. Eshelman and T. Crawford re Trump Strategy (Eshelman 00088)				
16.	November 11, 2020 email from F. Eshelman to T. Crawford re time is not our friend (Eshelman 00094)				
17.	November 11, 2020 email between C. Engelbrecht, F. Eshelman and T. Crawford re election effort (Eshelman 00096-97)				
18.	November 11, 2020 email between F. Eshelman and C. Engelbrecht re Thanks (Eshelman 00101-102)				
19.	November 11, 2020 email between C. Engelbrecht and multiple recipients re Survey results (Eshelman 00103)				
20.	November 12, 2020 email between T. Crawford and F. Eshelman re call with Bopp (Eshelman 00126)				
21.	November 12-13, 2020 email between F. Eshelman and T. Crawford re call with Bopp –				

	Having Nan transfer \$500k today (Eshelman 00130-131)				
22.	November 13, 2020 email from J. Bopp Jr. to T. Crawford, dymailbox@gmail.com re Our theme (Eshelman 00132-134)				
23.	November 13, 2020 letter from F. Eshelman authorizing Wells Fargo Bank to wire transfer of \$500k (Eshelman 00137)				
24.	November 14, 2020 email between C. Engelbrecht and F. Eshelman re Can we get on a call? (Eshelman 00157)				
25.	November 14, 2020 email between C. Engelbrecht and F. Eshelman re Invoice 11032020-98753 from Old Town Digital Agency (Eshelman 00158-161)				
26.	November 15, 2020 email between F. Eshelman and C. Crawford re \$1M invoice (Eshelman 00164-165)				
27.	November 13-15, 2020 email between C. Engelbrecht and F. Eshelman re The Old Town Invoice (attached) (Eshelman 00167-170)				
28.	November 15, 2020 emails between C. Engelbrecht, F. Eshelman and J. Bopp re situation (Eshelman 00176-178)				

29.	November 15, 2020 email between C. Engelbrecht, F. Eshelman and J. Bopp re situation (Eshelman 00186-188)				
30.	November 15, 2020 email between T. Crawford, F. Eshelman and C. Engelbrecht re situation (Eshelman 00189-192)				
31.	November 15-16, 2020 emails between T. Crawford, F. Eshelman and C. Engelbrecht re situation (Eshelman 00197-200)				
32.	November 16, 2020 email from N. Howard to T. Crawford, C. Engelbrecht, J. Bopp and F. Eshelman re Topics for afternoon call (Eshelman 00222-223)				
33.	November 16, email from F. Eshelman to C. Engelbrecht re Gregg (Eshelman 00224)				
34.	November 16, 2020 email between F. Eshelman and T. Crawford re AZ (Eshelman 00230)				
35.	November 16, 2020 email from F. Eshelman to T. Crawford re pure CYA (Eshelman 00231)				
36.	November 16, 2020 email between F. Eshelman, J. Bopp and C. Engelbrecht re Validate the Vote project (Eshelman 00234-235)				

37.	November 16, 2020 email between T. Crawford, and F. Eshelman re had enough (Eshelman 00238-239)				
38.	November 16, 2020 email from T. Crawford to F. Eshelman re Gregg (Eshelman 00240)				
39.	November 19, 2020 email between T. Crawford, C. Engelbrecht and F. Eshelman re Funding (Eshelman 00254)				
40.	November 24, 2020 email between C. McKenzie re Invoice #11032020-98753 (Eshelman 00259-260)				
41.	Docket Sheet re <i>Brooks et al., v. Mahoney, III et al.</i>				
42.	Verified Complaint in <i>Brooks et al., v. Mahoney, III</i> (Dkt. No. 1)				
43.	Order of Dismissal in <i>Brooks et al., v. Mahoney, III</i> (Dkt. No. 21)				
44.	Verified Complaint in <i>Langenhorst, et al v. Pecore</i> (Dkt. No. 1)				
45.	Plaintiffs' Notice of Dismissal in <i>Langenhorst, et al v. Pecore</i> (Dkt. No. 25)				
46.	Plaintiffs' Notice of Dismissal in <i>Langenhorst, et al v. Pecore</i> (Dkt. No. 26)				
47.	Plaintiffs' Notice of Dismissal in <i>Langenhorst, et al v. Pecore</i> (Dkt. No. 27)				
48.	Docket Sheet re <i>Langenhorst, et al v. Pecore</i>				

49.	Notice of Dismissal in <i>Pirkle, et al., v. Wolf, et al.</i> (Dkt. No. 20)				
50.	Docket Sheet re <i>Pirkle, et al., v. Wolf, et al.</i>				
51.	Verified Complaint in <i>Pirkle, et al., v. Wolf, et al.</i> (Dkt. No. 1)				
52.	Order of Dismissal in <i>Pirkle, et al., v. Wolf, et al.</i> (Dkt. No. 21)				
53.	Docket Sheet re <i>Bally et al, v. Whitmer, et al.</i>				
54.	Verified Complaint in <i>Bally et al, v. Whitmer, et al.</i> (Dkt. No. 1)				
55.	Notice of Dismissal in <i>Bally et al, v. Whitmer, et al.</i> (Dkt. No. 14)				
56.	Invoices to True the Vote, Inc. (multiple vendors)				
57.	Supplemental Agreement for Legal Services re TTV's Validate the Vote Project between TTV and The Bopp Law Firm, PC (TTV 0071-75)				
58.	Validate the Vote 2020 Plan				
59.	November 17, 2020 TTV Press Release				
60.	November 19, 2020 Email from F. Eshelman to C. Engelbrecht re Funding				
61.	November 21, 2020 Letter from R. Jacobs to C. Engelbrecht re Return of Funds				
62.	November 21-22, 2020 Email Chain Between R. Jacobs and				

	C. Engelbrecht re Return of Funds				
63.	November 21-22, 2020 Email Chain Between R. Jacobs and C. Engelbrecht re Return of Funds				
64.	November 23, 2020 Letter from R. Jacobs to C. Engelbrecht re Notice of Claim and Pre-Suit Demand				
65.	November 23, 2020 Letter from J. Bopp to R. Jacobs re True the Vote, Inc.				
66.	November 9, 2020 OPSEC Group Invoice				
67.	December 7, 2020 OPSEC Group Invoice				
68.	Declaration of T. Wilson				
69.	2016 Form 990 for True the Vote				
70.	2017 Form 990 for True the Vote				
71.	2018 Form 990 for True the Vote				
72.	True the Vote Invoice List				

Respectfully submitted,

January 27, 2021
Date

/s/ Douglas A. Daniels
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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of January, 2021 a true and correct copy of the above foregoing document has been forwarded to counsel of record via ECF, and via email.

/s/ Douglas A. Daniels

Douglas A. Daniels